

## R E M A R K S

The issues currently in the instant application are as follows:

- Claims 1-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over US 6,741,868 (Park) in view of US 2003/0040311 (Choi).

Applicant traverses the outstanding rejection and requests reconsideration and withdrawal thereof in light of the remarks contained herein.

### 35 U.S.C. § 103(a) -Park and Choi

Claims 1-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over US 6,741,868 (Park) in view of US 2003/0040311 (Choi). Park contemplates a hybrid type terminal, capable of using either a synchronous or an asynchronous communication protocol, selecting from either a synchronous or an asynchronous core network. Note that the core networks of Park are completely independent and not shared. See FIGs. 4A-4D of Park. Choi proposes a cell selection method where each candidate cell belongs to one PLMN, but not all of the candidate cells belong to the same PLMN. See FIG. 1 of Choi. Note that each cell is uniquely identified by its PLMN ID *plus* its Cell ID.

As the Examiner stated in the January 20, 2006 Office Action, Park is silent on “selecting a PLMNid to form a selected public land mobile identifier; setting an indicator to indicate whether a substitute public land mobile network is allowed; determining whether the selected public land mobile network identifier corresponds to a shared network; forming a registration request message containing the selected public land mobile network identifier; including the indicator in the registration request message, if the selected public land mobile network identifier corresponds to a shared network; and transmitting the registration request message” as recited in claim 1.

Choi does not overcome the acknowledged deficiencies of Park. Nowhere does Choi or Park show or suggest “determining whether the selected public land mobile

network identifier corresponds to a shared network.” In fact, neither Park nor Choi contemplates a shared network. Additionally, Park and Choi do not show or suggest “forming a registration request message containing the selected public land mobile network identifier; including the indicator [indicating whether a substitute public land mobile network is allowed] in the registration request message, if the selected public land mobile network identifier corresponds to a shared network; and transmitting the registration request message” as recited in claim 1.

The paragraphs of Choi that the Examiner points out ([0044], [0045], and [0071]) do not mention or refer to “determining whether the selected public land mobile network identifier corresponds to a shared network.” In both Park and Choi, each network is a distinct set of components without shared elements. See FIGs. 1A-1B and 4A-4D of Park. Thus, there is no need, motivation, or teaching regarding “forming a registration request message containing the selected public land mobile network identifier” because requesting registration with a particular cell in accordance with Park and Choi automatically requests registration with the single public land mobile network associated with that cell, and there is no suggestion regarding “including the indicator [to indicate whether a substitute public land mobile network is allowed] in the registration request message” because there is no substitute public land mobile network available in Park and Choi at any time -- and certainly not at a time of registration.

Thus, claim 1 is not unpatentable over Park and Choi. Claim 2 has been canceled. Claims 3-9 and 24 depend directly or indirectly upon amended claim 1 and thus are also not unpatentable over Park and Choi.

Because there is no need, motivation, or teaching in Park and Choi to create a registration request message including a selected public land mobile network identifier and an indicator indicating whether a substitute public land mobile network is allowed as described in claim 1, then there is no need, motivation, or teaching in Park and Choi to extract a selected public land mobile network identifier or an indicator from a registration request message as recited in claim 10. The proposal in Choi to confirm

previously stored PLMN IDs has nothing to do with shared networks. In both Park and Choi, each network has separate components that are not shared. Additionally, neither Park nor Choi show or suggest a registration request message having a selected public land mobile network identifier that can be extracted or an indicator that can be determined. Thus, claim 10 is not unpatentable in view of Park and Choi. Claims 11-16 depend directly or indirectly upon claim 10 and thus are also not unpatentable over Park and Choi.

Independent claim 17 is not unpatentable over Park and Choi for the reasons outlined above, namely that Park and Choi do not show or suggest “determining whether the selected PLMNid corresponds to a shared radio access network (RAN); forming a registration request message with the selected PLMNid; including the indicator in the registration request message, if the selected PLMNid corresponds to a shared RAN; and transmitting the registration request message from the UE.” Note that claim 17 specifically recites a shared radio access network. Nowhere do Park or Choi mention, suggest, or teach about shared radio access networks. Claims 18-22 depend directly or indirectly upon amended claim 1 and thus are also not unpatentable over Park and Choi.

Regarding claim 23, Park and Choi fail to show or suggest “setting an indicator to indicate whether a substitute public land mobile network is allowed” and “including the indicator in the registration request message” as discussed previously. Thus, claim 23 is not unpatentable in view of Park and Choi.

Reconsideration and withdrawal of the rejection of claims 1-24 under 35 U.S.C. § 103(a) as being obvious in view of Park and Choi is respectfully requested.

### S U M M A R Y

The application is in condition for allowance and a favorable response at an early date is earnestly solicited. Should the Examiner have any questions, comments, or

suggestions, the Examiner is invited to contact Applicant's representative at the telephone number indicated below.

Please charge any fees associated herewith, including extension of time fees, to **Deposit Account 502117.**

Respectfully submitted,

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